

July 29, 1999

Members of the Commission and Staff:

Thank you for this opportunity to file comments in favor of the Low Power FM Rulemaking, MM 99-25.

I write on behalf of a consortium which includes California State University, Long Beach and the City of Long Beach. Allow me to immodestly suggest that we are just the sort of potential license holder you had in mind with this enlightened proposal. Let me assure you that our consortium, and others like it, would serve the public interest, convenience and necessity with programming no other broadcaster--commercial or public--is currently providing.

Specifically, we would offer a busy schedule of community-based programming which is utterly unavailable anywhere in our end of the Los Angeles/Orange County market:

- News and Public Affairs—Originating both from established institutions and members of the public. Living in the shadow of Los Angeles, we have grown sadly accustomed to the short shrift paid our issues and concerns by current broadcasters.
- Sports—From Little League through the University's diverse schedule, there is NO current broadcast outlet interested in these popular, community-building competitions.
- Emergency Information—Los Angeles-based broadcasters do an admirable job during disasters, but they cannot adequately service the Long Beach market of 500,000+, which is nevertheless no more than a minority fraction of their total coverage.
- Entertainment and Information for Underserved Community Segments—Long Beach has the largest Cambodian population outside of Cambodia itself. The Long Beach Unified School District has students who are native speakers of more than fifty languages. Special attention would be paid to the provision of programming for these segments.

We certainly understand the resistance shown by current license holders to this proposal. If we are lucky enough to receive a license, we fully intend to attract listeners away from them. We find the much publicized opposing arguments of the commercial broadcasters to be particularly ludicrous, and quite obviously based purely on their fear of reduced revenue. We hope you will recognize the irrelevance of this concern, in the face of your proposal's potential.

Regarding some specific issues which have surfaced:

- We are strongly in favor of unlimited license renewals, based on careful review of the level of service provided by the licensee.
- We are strongly in favor of measures which will discourage the licensing of national or regional providers, unless they commit to a minimum of 90% locally originated, community service programming.
- We are also in favor of the proposed single owner limit of five to ten stations, with our preference at the low end of this range.
- We must reluctantly oppose the so-called "microradio" proposal. The practical regulatory considerations involved--including interference issues--do not appear manageable in any reasonable fashion.
- We strongly oppose the concept of a "first come" award process. We appreciate and regret the burden a more qualitative award process would place upon staff, but we see no other way to insure that the great potential for service is met.

Low Power FM can work as you have hoped. It can fulfill the promise of the medium in ways that have only existed in tantalizing, isolated cases to date. We hope you will be successful in this courageous initiative, which will create a legacy of service that will long outlast your own tenure. Again, thank you, and good luck.

Yours truly,

Mat Kaplan, Director
Advanced Media Production Center/CSU Long Beach